UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

October 26, 2015

Mr. Theodore A. Brown, P.E.
Chief, Planning and Policy Division
Directorate of Civil Works
U.S. Army Corps of Engineers
441 G Street NW
Washington, D.C. 20314-1000

Dear Mr. Brown:

The U.S. Environmental Protection Agency has reviewed the Final Integrated Feasibility Report and Environmental Impact Statement for the Skokomish River Basin Ecosystem Restoration (EPA Region 10 Project Number 10-056-COE), as well as the proposed report of the Chief of Engineers and the report of the district engineer on the Skokomish River Basin Ecosystem Restoration Project, Mason County, Washington. We are submitting comment on the Final EIS in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. We would also like to convey our concurrence with the Chief of Engineers proposed report, which was prepared in accordance with established coordination procedures on water resources reports.[1]

EPA issued a Lack of Objections rating for the Draft EIS and supported Alternative 27, the preferred alternative. However, the Final EIS identifies Alternative 18 as the preferred alternative. Alternative 18 is more acceptable to landowners and includes the same components as Alternative 27 except for restoration of Hunter Creek and Weaver Creek tributaries. While this is a reduction in anticipated project benefits, we agree that the Corps' recommended plan will achieve critical restoration needs in the project study area and appreciate that the Corps' cost effectiveness analysis has identified the most promising projects for consideration in future restoration efforts.

We also appreciate the Corps' response to our detailed comments and recommendations on the Draft EIS. Specifically, the Corps:

- has learned more about past and current restoration in the watershed and used this information in a risk analysis on sediment input rate and the effects to restoration designs;
- will improve water quality by expanding wetland areas through levee breaching and removal, will revegetate with high density native plantings to accelerate ground coverage and canopy development, and will monitor and adaptively manage the sites;
- will verify sources of large woody debris (logs, root wads) used for engineered log jams and ensure that restoration actions do not cause unnecessary ecological impacts elsewhere; and
- has sampled the car body levee for hazardous and toxic wastes and found no results warranting further evaluation.

[1] Per the Corps' request, letter of September 18, 2015.

The Corps states that during construction, the car bodies will be considered solid waste and will be disposed of at an appropriate disposal site. Our remaining recommendation is that any car bodies or other debris excavated during construction that is suitable for recycling be recycled rather than disposed of as solid waste.

We thank the Corps for the opportunity to review the Final EIS and the proposed report of the Chief of Engineers and district engineer for this beneficial project. We look forward to implementation of the restoration plan and encourage you to contact us if we can be of assistance. You may contact me at (206) 553-1601 or via electronic mail at littleton.christine@epa.gov, or contact Elaine Somers at (206) 553-2966 or via electronic mail at somers.elaine@epa.gov.

Sincerely,

Christine B. Littleton

Christine B. Littleton, Manager
Environmental Review and Sediment Management Unit

Cc: Nancy C. Gleason, U.S. Army Corps of Engineers